

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FRANCOISE ENFORT,	)	
Plaintiff,	)	
	)	C.A. No. 05-11896-RGS
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
Defendant.	)	
	)	
IRMA LORENUS,	)	
Plaintiff,	)	
	)	
v.	)	Case No. 05-11903-RGS
	)	
UNITED STATES OF AMERICA,	)	
Defendant.	)	
	)	
YVETTE LORENUS,	)	
Plaintiff,	)	
	)	
v.	)	Case No. 05-11901-RGS
	)	
UNITED STATES OF AMERICA,	)	
Defendant.	)	
	)	

**PROPOSED JOINT RULE 16.1 STATEMENT**

The parties in this action submit the following Proposed Joint Statement pursuant to Local Rule 16.1 and the Court's Order.

1. **Proposed Discovery Plan:**

- a. Automatic disclosure statements and discovery shall be served on or before March 15, 2006;
- b. All discovery, except for expert depositions and interrogatories (see Section 4 below), shall be completed by October 2, 2006;

- c. Any Amendments pursuant to Fed. R. Civ. P. 15 shall be made by May 1, 2006;
- d. A final pretrial conference shall be scheduled after decisions are rendered on a motion for summary judgment.

2. **Number of Depositions**

- a. The plaintiffs intend to take written discovery and depose any fact witnesses identified by the defendant.
- b. Defendant intends to depose the plaintiffs and any witnesses they identify as to their damages. The defendant may depose any fact witnesses that are no longer employees of the defendant. Since no discovery has yet occurred, the Defendant cannot identify possible deponents with greater specificity at this time.

2. **Consent to Trial By Magistrate**

- a. The plaintiff does not object to a trial by Magistrate in this case.
- b. The defendant does not object to a trial by Magistrate in this case.

3. **Proposed Schedule for Motions**

- a. All dispositive motions are to be filed by February 1, 2007; and any oppositions to such motions are to be filed within thirty days of

receipt of the motion.

4. **Designation of Experts**

- a. Expert witnesses shall be identified by the parties by November 1, 2006.
- b. If necessary, the opposing party shall have thirty days after the designation of the expert in which to designate its own expert.
- c. If necessary, expert depositions shall be conducted and/or interrogatories shall be served within thirty days following the opposing party's disclosure of expert witnesses.

5. **Final Pre-Trial Conference**

- a. The Final Pretrial Conference will be scheduled by the Court following all hearings on dispositive motions.

Respectfully submitted,

FRANCOISE ENFORT,  
YVETTE LORENUS, and  
IRMA LORENUS,

By their Attorney,

JOHN E. POTTER, Postmaster  
General,

By his Attorneys,

MICHAEL J. SULLIVAN  
United States Attorney

/s/ David Green  
David Green, Esq.  
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60 Arsenal Street  
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(617) 926-8800

/s/ Damian W. Wilmot  
Damian W. Wilmot  
Assistant U.S. Attorney  
1 Courthouse Way, Suite 9200  
Boston, MA 02110  
(617) 748-3398

**CERTIFICATE OF SERVICE**

Suffolk, ss.

Boston, Massachusetts  
February 7, 2006

I, Damian Wilmot, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing upon counsel of record, David Green, Alford & Bertrand, LLC, 60 Arsenal Street, Post Office Box 322, Watertown, MA 02471-0322, by first class mail, postage pre-paid.

/s/ Damian W. Wilmot  
Damian W. Wilmot  
Assistant U.S. Attorney

**LOCAL RULE 7.1 CERTIFICATION**

I, Damian Wilmot, Assistant United States Attorney, do hereby state that on February 7, 2006, I spoke with Attorney Green and he assented to me signing his name to this Proposed Joint Rule 16.1 Motion.

/s/ Damian W. Wilmot  
Damian W. Wilmot  
Assistant U.S. Attorney